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VIA ECF

Hon. Peggy Kuo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Government Employees Insurance Company, et al. v. M S B Rx Corp., et al.*
Docket No.: 19-cv-232(NG)(PK)

Dear Magistrate Judge Kuo:

We represent Plaintiffs (collectively “GEICO” or the “Plaintiffs”) in the above-referenced matter. We write to respectfully request an extension of time to complete fact discovery and expert discovery. Pursuant to the Court-ordered Discovery Plan (Docket No. 31), fact discovery is set to conclude on January 15, 2020, with expert discovery concluding on May 22, 2020. The parties have recently focused significant efforts and resources towards settlement. Plaintiffs have, in fact, reached settlements with most of the Defendants in the case. However, with respect to Plaintiffs’ claims against the remaining Defendants (Irina Hakimi, KZ Pharmacy Inc, and Mani Ushyarov, D.O.), the parties need additional time to exchange discovery and conduct depositions.

Accordingly, we respectfully request that fact discovery be extended to May 31, 2020 and that expert discovery be extended to September 30, 2020. Counsel for all parties have consented to this request. This is the first request for an extension of the discovery schedule.

We appreciate the Court’s attention to this matter.

Respectfully submitted,

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